

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION**

IN RE: FTX CRYPTOCURRENCY
EXCHANGE COLLAPSE LITIGATION

No: 1:23-md-03076-KMM

MDL No. 3076

This Document Relates To:

Garrison v. Bankman-Fried,
No. 22-cv-23753-KMM

Garrison v. Paffrath,
No. 1:23-cv-21023-KMM

Norris v. Brady,
No. 23-cv-20439-KMM

Podalsky v. Bankman-Fried
No. 1:22-cv-23983-KMM

Garrison v. Golden State Warriors,
No. 1:23-cv-23084-KMM

Lam v. Bankman-Fried,
No. 1:23-cv-22195-KMM

Garrison v. Osaka,
No. 1:23-cv-23064-KMM

Garrison et al. v. Furia Esports LLC et al.,
No. 1:24-cv-20895-RS

Garrison et al. v. Lincoln Holdings LLC,
No. 1:24-cv-00655-JMC

*Garrison et al. v. Mercedes-Benz Grand Prix
Limited (d/b/a Mercedes-AMG Petronas
Formula One Team),*
No. 1:23-cv-24480-JEM

*Garrison v. Office of The Commissioner of
Baseball d/b/a Major League Baseball,*
No. 1:23-cv-24479-KMM

Garrison v. Riot Games, Inc.,
No. 1:24-cv-21296-KMM

*Garrison v. Wasserman Media Group, LLC
and Dentsu McGarry Bowen LLC,*
No. 23-cv-24478-KMM

**DEFENDANT UDONIS HASLEM'S INDIVIDUAL BRIEF IN SUPPORT OF MOTION
TO DISMISS PLAINTIFFS' FIRST AMENDED CLASS ACTION COMPLAINT**

In addition to the reasons in the *Motion to Dismiss* (ECF 943), Defendant Udonis Haslem (“Mr. Haslem”) raises the following individual and specific issues in support of dismissal of all claims against him:

Introduction and Argument

Plaintiffs allege nothing of consequence against Mr. Haslem in the *First Amended Administrative Class Action Complaint* (ECF 908) (“FAC”) and instead recycle the same threadbare tweets, conjecture, and speculation present in the initial [*Corrected*] *Administrative Class Action Complaint and Demand for Jury Trial* (ECF 179). Nowhere do Plaintiffs credibly allege that any act or omission of Mr. Haslem caused them to do anything. Accordingly, the First Amended Complaint should be dismissed as to Mr. Haslem with prejudice.

Additionally, Mr. Haslem joins in and incorporates by reference Defendant Stephen Curry’s Individual Brief in Support of Motion to Dismiss Plaintiffs Amended Class Action Complaint (ECF 949) in opposition to the allegation in the FAC that Mr. Haslem’s affiliation with the NBA or any NBA team imposed any additional obligations on Mr. Haslem as an individual. FAC ¶ 548. This unsupported allegation establishes nothing and, to the extent relied upon by Plaintiffs to attempt to establish any element of a claim, further supports dismissal of the claims against Mr. Haslem.

Conclusion

For the reasons stated in the Motion to Dismiss and herein, the Court should dismiss the Amended Complaint as to Mr. Haslem with prejudice, award him his fees and costs as provided by law, including pursuant to Fla. Stat. § 517.211(7), and grant him such other and further relief as the Court deems just and proper.

Dated: July 27, 2025

Respectfully submitted,

/s/ Dorian Daggs

Dorian Daggs (Fla. Bar No. 1028485)

Dorian.daggs@squirepb.com

Squire Patton Boggs (US) LLP

200 S. Biscayne Boulevard, Ste. 3400

Miami, Florida 33131

(305) 577-7000

(305) 577-7001 (fax)

Counsel for Defendant Udonis Haslem